

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 13
)	
KENETTA NATASHE MUHAMMAD)	CASE NO. 17-59230-JWC
AKA KENETTA KELLY)	
DEBTOR.)	

KENETTA NATASHE MUHAMMAD.)	
MOVANT,)	
)	
V.)	CONTESTED MATTER
)	
THE MONEY SOURCE INC.)	
NANCY J. WHALEY, TRUSTEE)	
RESPONDENTS.)	

**RESPONSE TO DEBTOR'S MOTION TO APPROVE SALE OF REAL
PROPERTY**

COMES NOW, The Money Source Inc ("Respondent"), a secured creditor in the above-captioned case and, by and through counsel, files this Response to Movant's Motion to Sell ("Motion"), and respectfully shows the Court as follows:

1. On May 25, 2017, Debtor filed a petition with the Bankruptcy Court for the Northern District of Georgia under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Movant holds a Promissory Note secured by the Security Deed which describes real property owned by Debtor and known as: 2049 Highview Road South West, Atlanta, Georgia 30311 ("Property").
3. On June 2, 2020, Movant filed a Motion seeking to sell the Property.

4. Respondent requires that any sale of the Property shall pay off Respondent's lien in full.

5. Respondent request that any order allowing the sale of the Property include a provision that such sale will be conducted within 90 days of the entry said order.

6. Respondent request that if the sale is not finalized and Respondent's lien is not paid off in full within 90 days of entry of the order allowing the sale of the Property, then the stay shall be lifted as to the Property.

WHEREFORE, Movant prays that the Court deny Movant's Motion, or, in the alternative, include the requested provisions in this response in any order granting Movant's Motion.

/s/Chad R. Simon
Chad R. Simon
Georgia Bar No. 646919
Bonial & Associates
Chad R. Simon
Managing Georgia Attorney
P.O. Box 80727
Atlanta, GA 30366
(770) 856-9046

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was provided via Regular U.S. Mail and/or Electronic Mail to the parties listed on the attached service list, this 15th day of June, 2020.

SERVICE LIST

Kenetta Natashe Muhammad
Loretta Kelly
2049 Highview Road SW
Atlanta, GA 30311

Loretta Kelly, *Co-Debtor*
2049 Highview Road SW
Atlanta, GA 30311

Howard P. Slomka
Slipakoff & Slomka, PC
Suite 2100
3350 Riverwood Parkway
Atlanta, GA 30339

Julie M. Anania
Nancy J. Whaley
Standing Chapter 13 Trustee
Suite 120
303 Peachtree Center Avenue
Atlanta, GA 30303

/s/Chad R. Simon

Chad R. Simon

Georgia Bar No. 646919

Bonial & Associates

Chad R. Simon

Managing Georgia Attorney

P.O. Box 80727

Atlanta, GA 30366

(770) 856-9046